

IN THE DISTRICT COURT OF THE UNITED STATES
 FOR THE MIDDLE DISTRICT OF ALABAMA
 NORTHERN DIVISION

2006 APR 20 A 10:01

Richard Wayne Wright, Sr. *
 Plaintiff, Pro-Se., * Civil Action NO
 - VS - * 2:05-CV-439-A-WO
 Sylvester Nettles, et al., *
 Defendant *

Motion To Amend Plaintiff Wright, Complaint

I Richard Wayne Wright, Sr., Pro-Se., Plaintiff Files this (said) Motion to Amend his Complaint. Plaintiff is Faced with enormous amounts of retaliation / Conditions of more Cruel and unusual treatment by defendant M.L. Monk and [his] agent(s) all under the Authority of Warden Daryl Parker (assistant Warden) and Warden J.C. Giles (Head Warden). To Cover up defendant Monk neglect concerning [his] agent(s) (Sgt. Sherwin Carter (Co. II) (BIM); Officer Roosevelt Brown (Co. I) (BIM); Officer Levy Richardson (Co. I) (BIM) 'whom' assisted ofc. Brown and Sgt. Carter in placing restraints on plaintiff but Fail to report the assault properly and Sgt. Carolyn Longmire (Co. II) (BIF) who Fled the scene when Sgt. Carter initially assaulted plaintiff and did nothing

to stop or try to stop these OFFICIALS - nor did [they] properly report this assault to the superior OFFICERS) which occurred on or about November 23, 2005. They applied the Following Disciplinary upon plaintiff to cover up these illegal acts. (see Exhibits Six (6), Seven (7) and Eight (8)). Warden Giles approved [this] disciplinaries and Warden Parker came to the scene to plaintiff knowledge [they] have failed to properly notify Alabama Department of Correction Investigation and Intelligence Division.

As a result of the Back injuries plaintiff suffers from the above mention assault Dr. Samuel Rayapati declared this is adequate treatment for the injuries to the muscles or nerves in plaintiff back. (see Exhibit nine (9) and Ten (10)).

IF this motion is not in its proper Form plaintiff ask that this Honorable Court Construed it into its proper Form

Done this the 18th day of April, 2006.

Respect Fully Submitted,

Richard W Wright, Jr.
Richard Wayne Wright, Sr. #187140
Ventress Correctional Facility

Infirmary Room # 103
Post Office Box 767
Clayton, Alabama 36016

Certificate of Service

This is to Certify that I Richard Wayne Wright Sr. am the petitioner, Pro-Se., in the above encaptioned motion and Certify I have Sent this motion to the Clerk of this Court and Earnestly ask due to plaintiff indigent status that this Honorable Court Forwarded a Copy of this (said) motion to defendants Counsel(s) which are as Following:

Gregory F. Yauhman?
ASB 2411 - H 676
Scott Sullivan, Streetman & Fox, P.C.
2450 Valley Dale Road
Birmingham, Alabama 35244

Troy King (Attorney General)
State Bar # ASB - 5949 - 5615
Steven Mallette Sirmon
Assistant Attorney General
Hugh Davis Attorney
Alabama Board Pardon and Paroles
Post Office Box 302405
Montgomery, Alabama 36130

David B. Block (ASB - 5098 - K 62D)
William R. Lunsford (ASB - 4265 - L72L)
Douglas B. Hargett (ASB 9928 - S81H)
Balch & Bingham LLP
Post Office Box 18668
Huntsville Alabama 35804 - 8668

Kim T. Thomas
Gregory Marion Biggs
Alabama Department of Correction
Legal Division
301 Ripley street
Montgomery, Alabama 36130

by placing this motion in the United States
mail box at Ventress Correctional Facility
by 'hand delivery' to the on duty officer
so that this be placed in the legal mail box
for postage to be provided by the proper
prison official here at V.C.F. and
properly address this on the 18th day
of April, 2006.

Respectfully Submitted,
Richard W. Wright, Sr.
Richard Wayne Wright, Sr. #187140
Ventress Correctional Facility
Infirmary Room #103
Post Office Box 767
Clayton, Alabama 36014